

ANDREW V. JABLON (SBN 199083)
E-Mail: ajablon@rpblaw.com
STACEY N. KNOX (SBN 192966)
E-Mail: sknox@rpblaw.com
RESCH POLSTER & BERGER LLP
1840 Century Park East, 17th Floor
Los Angeles, California 90067
Telephone: 310-277-8300
Facsimile: 310-552-3209

Attorneys for Defendant Odell Beckham,
Jr.

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION**

ASHLEY PARHAM, JANE DOE, and
JOHN DOE,

Plaintiffs.

VS.

SEAN COMBS a/k/a "P. Diddy," "Puff Daddy," "Love," "Puffy" and "Diddy," KRISTINA KHORRAM, SHANE PEARCE, RUBEN VALDEZ, JOHN PELLETIER, ODELL BECKHAM JR., DREW DESBORDES a/k/a "Druski," JACQUELYN WRIGHT a/k/a "Jaguar Wright", HELENA HARRIS-SCOTT, MATIAS GONZALEZ, BRANDI CUNNINGHAM, JANICE COMBS, KEITH LUCKS a/k/a "Big Homie CC," and JOHN and JANE DOES 1-10.

Defendants

Case No. 3:24-cv-07191-RFL

**DECLARATION OF ODELL
BECKHAM JR. IN SUPPORT OF
MOTION OF ODELL BECKHAM
JR. FOR THE IMPOSITION OF
SANCTIONS AGAINST
PLAINTIFFS AND THEIR
COUNSEL PURSUANT TO FED. R.
CIV. P. 11; MEMORANDUM OF
POINTS AND AUTHORITIES**

Judge: Hon. Rita F. Lynn

Date: October 14, 2025

Time: 10:00 a.m.

Crtrm.: 15

Judge: Hon. Rita F. Lin

Trial Date: None Set

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DECLARATION OF ODELL BECKHAM, JR.

I, Odell Beckham, Jr., declare as follows:

1. I am over the age of 18, and have personal knowledge of the matters set forth herein. If called upon and sworn as a witness, I could and would competently testify to the matters set forth herein.

2. During the summer of 2018, I resided at a home on Solar Drive in Los Angeles, California. My friend and business associate, Ajay Sangha lived at Solar Drive with me that summer.

9 3. While staying in Los Angeles, if I was going to go out, I would hire a car
10 service – Red Limo Line, LLC (“Red Limo”) – to drive me and my friends. Grigor
11 Vahanyan, who I understand to be the owner of the car service, would drive me, and
12 if we were going out with multiple people and needed additional cars, Red Limo
13 would provide an additional driver.

14 4. On March 22, 2018, Mr. Vahanyan drove me and Mr. Sangha to various
15 locations in the Los Angeles area, including a trip to the VELO Sports Center in
16 Carson, CA where I had a training session. Attached as Exhibit “A” is a screen
17 capture of a video taken of me working out at 2:47 p.m. on March 22, 2018 at the
18 VELO Sports Center.

19 || 5. We returned home to Solar Drive at approximately 6:00 p.m.

20 6. I decided that I wanted to stay in that evening, and invited Jeremy Hill
21 to hang out with Mr. Sangha and me and play video games.

22 7. I had a text exchange with Cliff King, a representative from Nike, at
23 about 7:30 p.m. that evening. Mr. King asked what I was planning on doing that
24 night. I responded to him that I was laying low and getting some rest. I told him that
25 the workouts had been kicking my butt. A copy of that text exchange is attached
26 hereto as Exhibit "B".

27 8. Additionally, attached hereto as Exhibit "C" is a video which I recorded
28 of Messrs. Hill and Sangha playing video games with me at my home on Solar Drive.

I can be heard talking in the background.

2 9. Attached hereto as Exhibit “D” is: (a) a screen capture image from that
3 video; and (b) the metadata of that video showing the date and time it was recorded
4 (March 22, 2018, 10:02 p.m.). Mr. Hill did not leave until several hours after that.

5 10. I met with Mr. Cliff King from Nike at my Solar Drive home around 1
6 pm on March 23, 2018.

7 11. I did not leave the Solar Drive home until March 23, 2018, when Mr.
8 Vahanyan picked up me and Mr. Sangha at approximately 2:30 p.m.

9 12. On the evening of March 23, 2018, Mr. Sangha and I went out to eat and
10 to various bars in the Los Angeles area. We returned home to Solar Drive at
11 approximately 4:30 a.m.

12 13. The following morning, we left the home on Solar Drive at
13 approximately 9:30 a.m. Mr. Vahanyan drove me, Mr. Sangha, and my dogs to Santa
14 Monica beach, where I worked out with my personal trainer, Jamal Liggin.

14. Later that day, at approximately 2:00 p.m., Mr. Vahanyan brought me to
the Nickelodeon Kids Choice Awards at the Forum in Inglewood, California.
Attached as Exhibit “E” are photographs of me at the event.

18 15. At no time have I ever met Ashley Parham, the Plaintiff in *Ashley*
19 *Parham, et al. v. Sean Combs, et al.*, USDC Case No. 3:24-cv-07191-RFL. Further,
20 at no time have I been to Loma Vista Drive in Orinda, California. In fact, to the best
21 of my recollection, I have never been in Orinda, California.

22 I declare under penalty of perjury under the laws of the United States of
23 America that the foregoing is true and correct.

24 Executed on this 24th day of April, 2025, at Miami,
25 Florida
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Odell Beckham, Jr.